

**United States District Court**FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

for the

**Apr 06, 2021**

SEAN F. McAVOY, CLERK

**Eastern District of Washington****Petition for Warrant or Summons for Offender Under Supervision**

Name of Offender:	Charice Marie Unruh	Case Number:	0980 2:16CR00028-WFN-2
Address of Offender:	Spokane, Washington 99208		
Name of Sentencing Judicial Officer:	The Honorable Justin L. Quackenbush, Senior U.S. District Judge		
Name of Supervising Judicial Officer:	The Honorable Wm. Fremming Nielsen, Senior U.S. District Judge		
Date of Original Sentence:	December 7, 2016		
Original Offense:	Conspiracy to Commit Bank Fraud, 18 U.S.C. §§ 1349, 1344		
Original Sentence:	Prison - 37 months TSR - 60 months	Type of Supervision:	Supervised Release
Asst. U.S. Attorney:	James A Goeke	Date Supervision Commenced:	April 10, 2019
Defense Attorney:	Federal Defender's Office	Date Supervision Expires:	April 9, 2024

**PETITIONING THE COURT**To issue a **warrant**.

The probation officer believes that the offender has violated the following conditions of supervision:

<u>Violation Number</u>	<u>Nature of Noncompliance</u>
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1	<b><u>Mandatory Condition #1:</u></b> You must not commit another federal, state or local crime.
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**Mandatory Condition #2:** You must not unlawfully possess a controlled substance. You must refrain from any unlawful use of a controlled substance, including marijuana, which remains illegal under federal law.

**Supporting Evidence:** On April 2, 2021, Charice Unruh allegedly violated mandatory condition number 1 by accepting a package from the U.S. Postal Service that contained approximately 29 grams of methamphetamine.

On September 10, 2019, an officer with the U.S. Probation Office in Spokane, Washington, reviewed a copy of the conditions of supervision with Ms. Unruh, as outlined in the judgment and sentence. She signed a copy acknowledging the requirements.

On or about March 31, 2021, the U.S. Postal Inspection Service (USPIS) located a parcel investigators described as having "some of the characteristics consistent with packages that (the investigator) knows from her training and experience to contain controlled substances."

The package was addressed to "Charice Gonzales," a known alias of the offender, at the same address (including unit number) that the undersigned had authorized Ms. Unruh to

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reside at. Investigators subsequently learned that the offender's phone number had been used to sign up for U.S. Postal Service (USPS) text messaging alerts to receive updates on the parcel in question. A search of the parcel revealed approximately 29 grams of methamphetamine.

On April 2, 2021, a controlled delivery of the parcel was executed and Charice Unruh was observed using her mailbox key to retrieve the parcel from her locking mailbox.

Investigators made contact with the offender, who denied knowledge that there was drugs in the parcel. According to Ms. Unruh, "her friend, Jamie who lives in California sent her the subject parcel and had previously offered to send her meth in the mail, but she declined the offer. Ms. Unruh stated that she believed Jamie sent her the meth because she (Unruh) was having a difficult time and most likely the meth was an Easter gift."

2      **Mandatory Condition #1:** You must not commit another federal, state or local crime.

**Supporting Evidence:** On April 2, 2021, Charice Unruh allegedly violated mandatory condition number 1 by being in possession of two counterfeit postal keys, used to open locking postal mail receptacles, to include blue collection mailboxes and neighborhood cluster mailboxes.

On September 10, 2019, an officer with the U.S. Probation Office in Spokane, Washington, reviewed a copy of the conditions of supervision with Ms. Unruh, as outlined in the judgment and sentence. She signed a copy acknowledging the requirements.

On April 2, 2021, during a search of the offender's vehicle by the USPIS, which the offender consented to, investigators located what appeared to be two counterfeit postal keys in Ms. Unruh's wallet.

When interviewed by investigators, the offender admitted making the counterfeit postal keys, but claimed she had not finished the process or used them to open any mailboxes.

3      **Special Condition #1:** You must not open, possess, use, or otherwise have access to any checking account, ATM card, or credit card, without the advance approval of the supervising officer.

**Supporting Evidence:** On April 2, 2021, Charice Unruh allegedly violated special condition number 1 by being in possession of two Visa debit cards, in names other than the offender's.

On September 10, 2019, an officer with the U.S. Probation Office in Spokane, Washington, reviewed a copy of the conditions of supervision with Ms. Unruh, as outlined in the judgment and sentence. She signed a copy acknowledging the requirements.

On April 2, 2021, during a search of her vehicle by the USPIS, which the offender consented to, investigators located two Visa debit cards and a Washington State driver's license in Ms. Unruh's wallet. The debit cards and license were not in the offender's name. It should be noted, the offender did not request, nor receive authorization, to be in the possession of said Visa debit cards.

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- 4            **Mandatory Condition #2:** You must not unlawfully possess a controlled substance. You must refrain from any unlawful use of a controlled substance, including marijuana, which remains illegal under federal law.

**Supporting Evidence:** On April 2, 2021, Charice Unruh allegedly violated mandatory condition number 2 by being in possession of a user amount of methamphetamine.

On September 10, 2019, an officer with the U.S. Probation Office in Spokane, Washington, reviewed a copy of the conditions of supervision with Ms. Unruh, as outlined in the judgment and sentence. She signed a copy acknowledging the requirements.

On April 2, 2021, during an interview with USPIS investigators, Ms. Unruh denied any knowledge there were drugs in the parcel that was sent to her. According to the information she provided, “Unruh stated that she uses meth regularly and typically buys it at the casino in Spokane.” Additionally, “Unruh further advised that she currently had meth in her bedroom either on the bed or near it.”

A subsequent search of the offender’s apartment, also conducted on April 2, 2021, in fact revealed a user amount of methamphetamine.

- 5            **Standard Condition #9:** If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.

**Supporting Evidence:** On April 5, 2021, Charice Unruh allegedly violated standard condition number 9 by failing to notify the undersigned officer that she had been questioned by a law enforcement officer on April 2, 2021.

On September 10, 2019, an officer with the U.S. Probation Office in Spokane, Washington, reviewed a copy of the conditions of supervision with Ms. Unruh, as outlined in the judgment and sentence. She signed a copy acknowledging the requirements.

On April 2, 2021, the USPIS executed a controlled delivery of a package, found to contain 29 grams of methamphetamine, to Ms. Unruh. She was subsequently questioned by investigators and admitted to regularly using methamphetamine, making counterfeit postal keys, and ordering a credit card imprinter online to commit financial fraud with stolen mail.

On that same date, the offender’s vehicle and residence were subject to search and the following items were seized: a user amount of methamphetamine, mail addressed to persons other than Ms. Unruh, an enlarged photograph of a counterfeit postal key, postal key molds made of fast drying gel adhesive, drawings of postal keys, a sheet of metal used to make counterfeit postal keys, two counterfeit postal keys, counterfeit driver’s licenses picturing Ms. Unruh, however, with different names, a debit/credit card encoder, and blank debit/credit card and check stock.

As of the writing of this report, the offender has made no attempt to contact the undersigned officer to report her interaction with law enforcement.

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The U.S. Probation Office respectfully recommends the Court issue a **warrant** requiring the offender to appear to answer to the allegations contained in this petition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04/05/2021

s/Amber M.K. Andrade

Amber M.K. Andrade  
U.S. Probation Officer

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#### THE COURT ORDERS

- ☐ No Action  
☒ The Issuance of a Warrant  
☐ The Issuance of a Summons  
☐ Other



Signature of Judicial Officer

4/6/2021

Date